

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MATTHEW ALBRIGHT, Individually and
on Behalf of All Others Similarly Situated,

Plaintiff,

v.

TERRAFORM LABS, PTE. LTD., JUMP
CRYPTO, JUMP TRADING LLC,
REPUBLIC CAPITAL, REPUBLIC
MAXIMAL LLC, TRIBE CAPITAL,
DEFINANCE CAPITAL/DEFINANCE
TECHNOLOGIES OY, GSR/GSR
MARKETS LIMITED, THREE ARROWS
CAPITAL PTE. LTD., PANTERA
CAPITAL, NICHOLAS PLATIAS, and DO
KWON,

Defendants.

Case No: 1:22-cv-07281-JSR

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the Memorandum filed herewith Jump Trading, LLC, Terraform Labs, Pte. Ltd., Republic Maximal LLC d/b/a Republic Capital (together, “Republic”), and Pantera Capital Management LP hereby move this Court to transfer venue to the United States District Court for the Northern District of California.

The grounds for the motion are set forth in the accompanying Memorandum. Pursuant to the Court's direction, opposition briefs, if any, are due on October 25, 2022, and reply briefs, if any, are due on October 26, 2022.

Dated: New York, New York
October 21, 2022

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of October 2022, the foregoing document was electronically filed with the Clerk of the Court, to be served by the Court's electronic notification system upon all attorneys of record.

/s/Amanda Tuminelli
Amanda Tuminelli